OHIO DEPARTMENT OF TRANSPORTATION

CENTRAL OFFICE, 25 S. FRONT STREET, P.O. BOX 899, COLUMBUS, OHIO 43216-0899

November 19, 1996

Office of the Secretary
Federal Communications Commission
Washington, D. C. 20554

Dear Sir of Madam:

Enclosed are an original and nine copies of the Ohio Department of Transportation comments on WT Docket 96-86 concerning The Development of Operational, Technical and Spectrum Requirements for meeting Federal, State and Local Public Safety Agency Communication Requirements Through the Year 2010.

Do not hesitate to so inform me should you have further comments or questions regarding this submittal.

Yours truly.

Chester G. Jones
Radio Tech. Manager

Enclosures

CGJ:cgj

cc: RET
MJS
LG

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of	)	
The Development of Operational	)	WT Docket No 96-98
Technical, and Spectrum	)	
Requirements for Meeting	)	
Federal, State, and Local Public	)	
Safety Agency Communication	)	
Requirements Through the Year 2010	)	

Comments of the
Ohio Department of Transportation
Chester G. Jones
Office of Facilities Management
Ohio Department of Transportation
1610 West. Broad Street
Columbus, Ohio 43223

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

In the Matter of	)	
The Development of Operational	)	WT Docket No 96-86
Technical, and Spectrum	)	
Requirements for Meeting	)	
Federal, State, and Local Public	)	
Safety Agency Communication	)	
Requirements Through the Year 2010	)	

Notice of Proposed Rule Making

To: The COMMISSION

REPLY COMMENTS

The Ohio Department of Transportation (ODOT) respectfully submits these comments to the COMMISSION's Notice of proposed Rule making in the above captioned proceedings. ODOT is responsible for all five principal transportation modes and IHVS systems, and its major function is the maintenance and construction of State highways in the State of Ohio.

We feel that the present coordination system of multiple coordinators is the best for fairly meeting the needs of all State, County and Township agencies. A single coordinator couldn't understand our needs, and would distribute frequency on the basis of their own bias and perception of agencies needs and importance. We feel that there would be a loss of available spectrum to highway departments and that it would be reassigned to other agencies such as fire and police. It is doubtful that a single frequency coordinator would substantiality decrease the time required to obtain a FCC licence. Although the regional planning process for the National Public Safety Planning Advisory Committee's 800 MHZ Public Safety radio service frequency

assignments has enjoyed a level of success. We feel along with some other public safety users that all services did not have equal representation in the planning process.

In Ohio we feel that our present low-band VHF more then meets our needs, and that low-band must be retained. Presently we pay approximately $ 1,000 per unit and maintain our own equipment. Although the Ohio Department of Administrative Services is in the bid process for the construction of a 800 MHZ State wide area system, ODOT does not plan to participate in the System. ODOT would have to replace all 5,500 of its present radio units at a cost of approximately $ 2,300 each and pay an additional charge of $ 3,000 a year for each unit we have on the system for bond repayment and operational costs. This bond repayment and operational cost would increase our yearly budget by 16,500,000 million dollars. We would still also have to maintain our own system at our own expense. Since ODOT is presently satisfied with its low-band system and has no need for the 800 MHZ special features, we have no plans to participate in the 800 MHZ system.

ODOT supports a planning methodology for the assignment of all newly allocated spectrum, which recognizes that highway and transportation agency usage of telecommunications system is increasing, and that these users are often the first respondents to both man made and natural emergencies. The optimum planning process should give each user group equal voice in spectrum allocation decisions. The current process allocates all available spectrum based on fixed percentages to each category (radio service) of users. A better approach would be for some spectrum to be shared between all categories of users with some allocated to specific groups of users. A minimum of 10 percent of newly allocated spectrum in each band should be set aside for transportation agencies.

There are some specific instances where use of commercial systems are valuable, but while adequate for some operations , commercial systems cannot replace private systems. This was clearly demonstrated on April 19,1995 when the Federal Office Building in Oklahoma was bombed. In responding to that incident, the Officials of the Oklahoma Department of Transportation noted that the conventional telephone and the cellular service overloaded and was not available.

CONCLUSION

The Ohio Department of Transportation believes in the critical nature of Public Safety communication , and is open to any ideas for its improvement. The Commission must recognize that Public Safety has unique land mobile requirements and act accordingly.

We feel that the Commission must maintain the low-band VHF frequency band, and the present frequency coordination system. A reassignment of the low-band frequency spectrum or a change in the present system of frequency coordination would be harmful to many State Departments of Transportation including the Ohio Department of Transportation.

Office of Facilities Management
Ohio Department of Transportation
1610 West Broad Street
Columbus, Ohio 43223

Chester G. Jones
Radio Tech. Manager